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February 26, 2003

Ms. Verneta Simon, On-Scene Coordinator
U. S. Environmental Protection Agency
Region 5
77 W. Jackson Blvd., SE-5J
Chicago, Illinois 60604

RE: Proposed Wording for USEPA Letter to Lakeshore East, LLC Regarding Completion of Required Site Work—STS Project No. 1-32193-XC

Dear Ms. Simon:

Attached please find the proposed wording for the letter recently requested by Lakeshore East, LLC. You will remember this request was in response to their need for a letter from USEPA upon completion of the site grading work and associated radiation surveys, stating that all identified radiologically impacted material had been removed from the subject site and no further removal or surveys were required. This letter is needed to proceed with obtaining permits for the pending construction season work efforts.

We appreciate your prompt attention to providing the requested letter. Please contact Ms. Kara Hughes, Mr. Sean Linnane or Mr. David Carlins at Lakeshore East, LLC at 312-642-8869, or the undersigned at STS 847-279-2500 with any questions regarding this matter.

Regards,

STS CONSULTANTS, LTD.

Richard G. Berggreen, C.P.G.
Principal Geologist

cc: David Carlins, Lakeshore East, LLC
Kara Hughes, Lakeshore East, LLC
Sean Linnane, Lakeshore East, LLC

Proposed wording for USEPA letter regarding removal of radiologically impacted material from Lakeshore East Development site.

In accordance with the Work Plan for Investigation and Removal of Radiologically Impacted Soil, Lakeshore East LLC, dated June 24, 2002, revised September 13, 2002, final revision dated September 30, 2002, and approved by USEPA in correspondence dated September 20, 2002, removal of radiologically impacted soil has been conducted at the Lakeshore East Development site, at 221 North Columbus Drive, Chicago, Illinois. The removal actions followed a Phase I investigation, and consisted of two additional phases of work. Phase II consisted of removing all radiologically impacted material that had been identified in the Phase I series of surface radiological surveys and down-hole exploration surveys. USEPA performed verification surveys and sampling at those locations where radiological materials were removed and confirmed all materials had been removed to below the specified cleanup threshold of 7.1 pCi/g total radium.

The Phase III work consisted of gamma surveys of fill soil that was present on the site above the approximate elevation of the ground surface at the site in the year 1900 (6 feet, CCD). Excavation of soil in 18-inch lifts and subsequent gamma surveys were conducted to confirm that no radiologically impacted material remained in those fill soils. Impacted materials encountered during Phase III were removed to at least the 7.1 pCi/g total radium cleanup standard. The excavation locations were surveyed and verification samples were taken by USEPA to confirm the removal activities were complete.

USEPA understands that Phases II and III have now been completed at the Lakeshore East Development site. This letter provides notice that all identified radiologically impacted materials have been removed to below the cleanup threshold specified by USEPA, and that no further radiological surveys or removals are required in those areas documented to be below the cleanup threshold.

Note, however, this determination that all radiologically impacted material has been removed does not apply to the portions of the site formerly occupied by the Slips C, D and E as they were present on site as depicted in historical Sanborn Fire Insurance maps dated 1906. (Include reference map showing specified locations.) Those former slip locations were covered by surface gamma surveys in the Phase I work, that explored the upper approximately 18 inches of soil. Those areas will continue to be subject to radiation surveys when and if excavation exceeding 18 inches in depth is planned or any other construction or development activities are proposed that may disrupt or bring these soils to the ground surface where they will be in contact with the public, construction workers, or where their management would require disposal on or off site.

Radiological survey requirements would also not apply to any fill soils imported to the site as part of the site development, to the extent that those soils can be distinguished from the soils previously present on site.